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U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

March 1, 2020

BY ECF

The Honorable Andrew L. Carter, Jr. United States District Judge Southern District of New York 40 Foley Square, Room 201 New York, New York 10007

Re: United States v. Johnny Nunez Garcia, 19 Cr. 766 (ALC)

Dear Judge Carter:

cc:

The Government respectfully requests that the Court enter the attached protective order, which would govern the handling of discovery in this case, and which contemplates different levels of protection for materials that contain various forms of personal and private information about the victim, potential witnesses, their friends and family, and other third parties. As reflected in the accompanying signature page, defense counsel consents to entry of this order.

Respectfully submitted,

GEOFFREY S. BERMAN United States Attorney

By:

Frank J. Balsamello / Adam Hobson Assistant United States Attorneys (212) 637-2325 / -2484

Aaron Mysliwiec, Esq., counsel for Johnny Nunez Garcia (by ECF)